

DECLARATION OF KEVIN SIEGEL, ESQ.

I, Kevin Siegel, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct to the best of my knowledge and belief:

1. I am an attorney at Brooklyn Defender Services in Brooklyn, New York.
2. On April 17, 2025, I spoke with my client, a Venezuelan national detained at the Bluebonnet Detention Facility in Anson, Texas, and with his partner several times on the phone.
3. My client and his partner told me that Venezuelan men detained at Bluebonnet were being given a piece of paper saying that they were about to be deported regardless of their immigration status because they are a danger to the United States and that these men were asked to sign the paper notice or a document provided with it. They also told me that ICE officials refused to say where the men would be deported.
4. My client and his partner also told me that individual men were being removed from the facility without warning upon receiving the paper notice.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: April 18, 2025

/s/ Kevin Siegel
Kevin Siegel, Esq.